



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

MEMO ENDORSED

April 30, 2025

Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
The Hon. Charles L. Bricant Jr. Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

**Re: *Kevin Horsey v. United States of America et al*, 24-cv-05030-KMK**

Dear Judge Karas:

This Office represents the United States of America (the “Government”) in this action brought by plaintiff Kevin Horsey (“Plaintiff”) under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671 *et seq.* (“FTCA”). This FTCA action concerns injuries allegedly sustained by Plaintiff while incarcerated in Federal Correctional Institution Otisville.

On April 20, 2025, Plaintiff filed a letter on the docket regarding allegations that the Bureau of Prisons (“BOP”): (1) failed to facilitate his participation in an initial conference;<sup>1</sup> (2) is mishandling his legal mail;<sup>2</sup> and (3) is refusing him access to the prison law library. On April 25, 2025, this Court directed the Government to respond to Plaintiff’s letter by May 2, 2025.

I write respectfully to request an extension of time to reply to Plaintiff’s letter from May 2, 2025, to May 13, 2025. The reason for this request is that I need additional time to gather information from the BOP to adequately respond to the issues Plaintiff raised. This is the Government’s first request for an extension of time to respond to Plaintiff’s letter. As Plaintiff is incarcerated and proceeding *pro se*, it is not possible to contact him in a timely manner to request his consent to an extension of time.

I thank the Court for its consideration of this request.

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<sup>1</sup> Although Docket Entry 30 states that a conference occurred on March 17, 2025, because the Plaintiff was not made available to join, the conference was not held, but the proposed case management order jointly filed by the parties at ECF 29 was endorsed.

<sup>2</sup> As of the time of the filing of this letter, the United States’ legal mail to Plaintiff included: (1) copies of docket filings with ECF Numbers 22-30; (2) initial disclosures including a four-page document and enclosures with Bates Stamps Horsey\_000001 to Horsey\_000498, and (3) the United States’ requests for productions and interrogatories directed at Plaintiff and Co-Defendant Seven Corners.

Respectfully submitted,

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

Granted. The Clerk is respectfully directed to mail  
this document to Plaintiff.

So Ordered.



5/2/25

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